

Deposition of Michael Spaargaren - August 13, 2015

1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION

4 Chicago Police Officer)
5 SHANNON SPAULDING, Chicago)
6 Police Officer DANIEL)
7 ECHEVERRIA,)
8 Plaintiffs,)
9 vs.)
10 CITY OF CHICAGO, et al.,)
11 Defendants.)

**CERTIFIED
TRANSCRIPT**

No. 12 CV 8777

12
13 The deposition of MICHAEL THOMAS
14 SPAARGAREN, called by the Defendant for
15 examination, taken pursuant to notice, agreement
16 and by the provisions of Rules of Civil
17 Procedure for the United States District Courts
18 pertaining to the taking of depositions, taken
19 before Kathleen P. Lipinski, Certified
20 Shorthand Reporter and Notary Public within and
21 for the County of Cook, State of Illinois, at
22 Drinker Biddle & Reath, LLP, 191 North Wacker
23 Drive, Suite 3700, Chicago, Illinois, on the
24 13th day of August, 2015, at 10:00 o'clock a.m.

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1 APPEARANCES:

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1 I N D E X

2 WITNESS EXAMINATION

3 MICHAEL THOMAS SPAARGAREN

4 By Ms. Davis 04

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8 E X H I B I T S

9 SPAARGAREN EXHIBIT PAGE

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1 (Witness sworn.)

2 MS. DAVIS: Let the record reflect
3 this is the discovery deposition of Michael
4 Spaargaren being taken pursuant to notice and
5 agreement of the parties and pursuant to the
6 applicable Rules of Civil Procedure and Federal
7 Rules of Evidence.

8 WHEREUPON:

9 MICHAEL THOMAS SPAARGAREN,
10 called as a witness herein, having been first
11 duly sworn, was examined and testified as
12 follows:

13 EXAMINATION

14 BY MS. DAVIS:

15 Q Will you state your full name for the
16 record?

17 A Sure. It's Officer Michael Thomas
18 Spaargaren.

19 Q Have you been deposed before?

20 A Yeah.

21 Q About how many times?

22 A I think probably like three times.

23 Q Three times, okay.

24 A Yeah.

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1 Q I'm going to tell you the ground
2 rules. You should be aware of them since
3 you've done this before --

4 A Sure.

5 Q -- but just to make sure that we're on
6 the same page, you've got to let me finish
7 asking my question before you give me an
8 answer.

9 A Okay.

10 Q The court reporter can only take down
11 one of us at a time, so we can't talk over one
12 another.

13 If at any time you need a break,
14 just let me know. Just I don't want you to
15 break while there's a question pending. Once
16 you give your answer, then we can take a break,
17 as many as you need. That's no problem.

18 If you don't understand a
19 question, let me know. I will rephrase the
20 question or maybe ask you a different question.

21 A Okay.

22 Q Because if you answer the question,
23 I'm going to assume you understood it, okay?

24 A Okay.

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1 Q Keep in mind that all of your
2 responses have to be verbal. She can't take
3 down nods of heads or shrugs of shoulders,
4 things we all do, but it has to be verbal when
5 you respond.

6 A Okay.

7 Q Those are really the ground rules, and
8 we can get started.

9 Just one more thing, you are
10 represented here today by an attorney?

11 A Yes.

12 Q And who is your attorney?

13 A Jeff to my left.

14 Q What's your address?

15 A 9553 South Hamilton Avenue, Chicago,
16 Illinois 60643.

17 Q How long have you been there?

18 A Approximately like 12 years now.

19 Q And who else lives there with you?

20 A My wife, my four-year-old daughter,
21 and then my mother-in-law.

22 Q You mentioned you had been deposed
23 three times previously. Were you involved in
24 those cases?

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1 A Yes.

2 Q And what role did you play in those
3 cases?

4 A One was for a civil lawsuit involving
5 another police officer and that case was -- Do
6 you want to know the details?

7 Q No. I just want to know who the
8 police officer was.

9 A Oh, it was Johnny Jenkins, yeah. He
10 was a disabled police officer.

11 Q And you testified?

12 A Yes.

13 Q Were you a plaintiff in the case or
14 no?

15 A Defendant.

16 Q You were a defendant?

17 A Yeah. It was a civil lawsuit.

18 Q And what was the result of that case?

19 A It was dismissed. It was in our
20 favor.

21 Q Dismissed in favor of defendant.
22 Okay, what about the other two times?

23 A The other time was -- I think it was
24 just twice. The other time was a -- I own a

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1 business. I do property inspections, and there
2 was a civil lawsuit against the homeowner who
3 sold the house and, of course, I was thrown
4 into the net, so to speak. I did the property
5 inspection, but I was also like released from,
6 you know, it was found -- they did a settlement
7 like at the last minute.

8 Q So you were a defendant in that case?

9 A Correct, for the record, yes.

10 Q But it didn't go to trial?

11 A It didn't go to trial.

12 Q It settled?

13 A It settled.

14 Q And those were the only other times
15 you've been deposed?

16 A I'm trying to think. Those two for
17 sure. I don't know if there was another one or
18 not, but it was definitely twice.

19 Q Any other cases you've been involved
20 in, lawsuits?

21 A Oh, lawsuit-wise, no. I think just
22 those two. Yeah, just those two.

23 Q Do you have any current cases pending?

24 A No.

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1 Q How did you prepare for this
2 deposition -- Or let me go back. Did you
3 prepare for this deposition?

4 A Basically I just spoke with Jeff on
5 the phone, just I think twice.

6 Q Did you review any documents?

7 A Just my affidavit statement, that was
8 it.

9 Q Did you review any other
10 depositions -- deposition transcripts?

11 A No, not related to this, nothing else.

12 Q Did you talk to anybody else besides
13 Jeffrey, your lawyer?

14 A Just Shannon, but, I mean, it was just
15 like normal conversation, so to speak.

16 Q Did you and Shannon talk about this
17 case?

18 A No, just about her harassment and the
19 fact that Watts was getting out of jail today.

20 Q Today as in today?

21 A Today today, yeah.

22 Q So when did you talk to Shannon?

23 A I don't know. Probably like about --
24 maybe about a month ago.

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1 Q And when you talked to her a month
2 ago, did you talk at all about your affidavit
3 and this case?

4 A No. We just talked about the fact
5 that I was going to have this date coming up.
6 That was it.

7 Q And what did you say to her and what
8 did she say to you about this date coming up
9 for your deposition?

10 A Oh, just to make sure that I get
11 represented by Jeff.

12 Q So Shannon told you to be sure you get
13 represented by Jeff?

14 A Correct.

15 Q Anything else she tell you?

16 A No, not that I recall, just that.

17 Q And prior to your talking to her about
18 a month ago, did -- had you had any other
19 conversations with her about this lawsuit?

20 A Probably -- Well, not necessarily
21 about the lawsuit. Just about the fact that
22 she was, you know, worried and getting harassed
23 and things like that, and that was probably
24 about a year and a half, two years ago.

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1 Q Okay, and we'll get into that, but I
2 want to stick to just talking about
3 conversations related to this lawsuit and your
4 affidavit.

5 A Okay.

6 Q Did you have any other conversations
7 with her about your affidavit?

8 A No.

9 Q Did you ever tell her that you were
10 going to be signing an affidavit?

11 A Well, she was there when I did the
12 affidavit.

13 (Spaargaren Exhibit A marked
14 as requested.)

15 BY MS. DAVIS:

16 Q All right, let's talk about that, so
17 I'm going to show you what we're going to mark
18 as Exhibit A. Do you recognize what that is?

19 A Sure.

20 Q And what is that?

21 A That's the affidavit that I gave.

22 Q Before we get into the affidavit, I
23 have a few more background questions and then
24 we'll jump right into the affidavit. Have you

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1 talked to Danny Echeverria?

2 A Just at this deposition -- or not at
3 the deposition. When I gave this affidavit.

4 Q Do you know Danny Echeverria?

5 A No. No, I don't know him.

6 Q So besides seeing him and talking with
7 him when you signed the affidavit, had you had
8 any other conversations with him?

9 A No. I don't know him.

10 Q So you had never even seen him prior
11 to that; is that fair to say?

12 A Yeah, just on television.

13 Q And besides your lawyer and Shannon,
14 have you talked to anything else about this
15 case or your deposition?

16 A No, no. I haven't even talked to my
17 wife about it.

18 Q Where did you attend high school?

19 A In West Lyden -- or West Lyden was the
20 high school. It's in Lyden Township.

21 Q And when did you graduate?

22 A 1986.

23 Q And after you graduated did you have
24 any other formal education beyond high school?

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1 A Yeah, I got my associate's.

2 Q From where?

3 A Richard J. Daley College here in
4 Chicago.

5 Q In what?

6 A Associate's of Science and Associate's
7 in Arts.

8 Q And when did you get those degrees?

9 A Let's see, I got out of the
10 military -- Let me think. I went in to the
11 military first from '86 to '90, so it was after
12 that. It would be probably about '93, June of
13 '93, I believe.

14 Q And when you went into the military,
15 what branch of the military were you in?

16 A U.S. Navy active duty.

17 Q Where were you stationed?

18 A I was stationed in Washington state
19 Oak Harbor to be exact, the city.

20 Q And you said you got out in 1990?

21 A Yes, June of '90.

22 Q Were you discharged? Were you
23 honorably discharged?

24 A Honorable discharge.

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1 Q Honorable discharge?

2 A I completed four years of time.

3 Q Okay, any other degrees or
4 certificates?

5 A Yeah. I'm a home inspector. That's
6 the business I was telling you about, so I'm a
7 home inspector licensed by the State with the
8 corresponding certificate, of course, to get
9 the license.

10 Q And when did you get that?

11 A Oh, let me see. I have to think about
12 that for a second. I've been doing this for
13 about -- I would have to look it up online to
14 give you the exact date, but --

15 Q Just approximately is fine.

16 A -- probably about like 13 years now.
17 That's how long I've been doing it for.

18 Q Any other degrees or certificates?

19 A No other degrees. I'm trying to think
20 if I have any other certificates. Not that I
21 can think -- I mean, I have certificates
22 related to the home inspection business, but
23 it's all like under the same umbrella, so to
24 speak. Like I'm a mold inspector. There's a

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1 certificate for that.

2 Q But they all have to do with home
3 inspection?

4 A Yeah, I just don't know like what
5 detail you're looking for. Everything is home
6 inspection related. Yeah, I don't have any
7 other certificates that I can think of.

8 Oh, well, there is one other
9 certificate. I'm also a licensed A&P. You
10 know, I'm an airplane mechanic, too, for the
11 military, so I'm licensed by the F A.A. to work
12 on commercial planes. I haven't done that in
13 so long. After I got out of the military, that
14 was going to be my job was doing that but then
15 the airlines, you know, went under; so yeah,
16 for the record, I'm a licensed airplane
17 mechanic, too.

18 Q So this is a good day for you to be
19 here because you see the planes going by.

20 A Yeah, I saw the jets flying. I was
21 telling my wife -- she just dropped me off -- I
22 used to work on planes like that.

23 Q All right, and so you had that license
24 as well. Has that expired?

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1 A No. It's like a lifetime thing, yeah.

2 Q All right, so have we covered all of
3 your educational background and degrees and
4 certificates?

5 A Yeah, I'm trying to think. I can't
6 think of anything else that comes to mind.
7 That's pretty much it.

8 Q Your employment history, can we talk
9 about that a little bit?

10 A Sure.

11 Q So you said you went into the navy.
12 So let's start after then. So after the navy,
13 where did you work?

14 A After the navy, I had a brief time
15 trying to find a job because I had just gotten
16 discharged, but probably about, I don't know,
17 like about six months later, I got employed by
18 Midway Airlines who is now -- of course, you
19 know, they're gone.

20 Q Right.

21 A So I worked for Midway Airlines for
22 about a year and then they went bankrupt and
23 then they closed, so I lost that job. And then
24 after that, I had a brief stint at Walgreens.

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1 I worked at Walgreens on Archer and Harlem here
2 in Chicago.

3 Q Doing what?

4 A Stock boy while I was going to school
5 because I was actually -- after I got out from
6 being an airplane mechanic, I realized that the
7 airlines were not doing very well at that time
8 so then I started going to school at Daley
9 College and the plan was to go to pharmacy
10 school, kind of a big change but -- I did
11 attend UIC but I didn't finish the program
12 because I withdrew from the program, the
13 pharmacy program, and then became the police.

14 Q So Walgreens was approximately 1992;
15 is that right?

16 A Let me see. I would probably say --
17 Yeah, about '92, yeah.

18 Q And then after Walgreens, where did
19 you work?

20 A After Walgreens, that was the only job
21 that I had when I was in school. I was in the
22 Reserves. I joined the Reserves, the Navy
23 Reserves and then the Army National Guard; so,
24 you know, as far as employment goes, I did that

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1 for a while, you know, one weekend a month. I
2 did that, and then let's see. After Walgreens,
3 I didn't have any other jobs after Walgreens
4 and then I just went to -- I was full-time in
5 school at Daley College. And then when I
6 finished Daley College, that's when I went to
7 UIC for one year.

8 Q Okay, and then after UIC, where did
9 you go?

10 A The police department.

11 Q So you joined the police department
12 what year?

13 A October 23rd of '95 was the exact
14 date.

15 Q And after you got out of in the
16 academy, where did you -- where was your first
17 assignment?

18 A My first assignment was in the
19 Englewood District, the 7th District.

20 Q The 7th District and so you stayed
21 there for how long?

22 A Almost exactly two years, like
23 25 months, I think.

24 Q So until approximately what, '97?

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1 A Let's see. I did six months in the
2 academy. I think it was like '98.

3 Q Then after the 7th District, where did
4 you go?

5 A To the 12th District.

6 Q And you stayed in the 12th District
7 from the 1998 until?

8 A Until like '99. I'm just trying to do
9 the math here, so '95, yeah, that sounds about
10 right. Then I was there for one year in the
11 12th District.

12 Q Then where else did you go?

13 A That's when I went to public housing
14 after that year was up.

15 Q So public housing and you stayed in
16 public housing from approximately 1999 until
17 when?

18 A I think I was there for like five
19 years, so let me think. Do you have a pen?

20 Q Sure.

21 (Item tendered.)

22 BY THE WITNESS:

23 A I'm just trying to get my dates
24 straight. What was the last question again?

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1 BY MS. DAVIS:

2 Q So you went to public housing in 1999.
3 You stayed for five years you said, so would
4 that be until about 2004?

5 A Yeah, I think so. I would have to
6 check with the department to get the exact
7 dates, you know what I mean, but I think that
8 sounds right. I have to look and see when I
9 took my leave of absence to see exact dates.

10 Q So from 2004 -- And I'm really trying
11 to catalog the history of your employment
12 there, so if it's not exact, that's fine.
13 Approximation is okay.

14 A Okay, okay.

15 Q So then after 2004, what was your next
16 assignment?

17 A That's when I left the department.

18 Q Okay, so you went on your leave of
19 absence?

20 A Correct.

21 Q And you were on leave for how long?

22 A 18 months.

23 Q And then you eventually did come back;
24 is that right?

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1 A Correct, yes.

2 Q When you were on leave of absence, it
3 was a paid leave?

4 A No, no. It was unpaid.

5 Q And then you came back and what --

6 A I went to the 22nd District.

7 Q The 22nd District?

8 A Yeah.

9 Q And you were there?

10 A I was there for about four years.

11 Q So probably about 2006?

12 A Yeah, 2006.

13 Q Until about 2010; is that right?

14 A Yeah, that sounds about right. Yeah.

15 Q And then from 2010, what was your
16 next?

17 A Then I went to the 9th District.

18 Q How long were you there?

19 A Let me see. This is 2015, so -- I've
20 been in my current assignment for about a year
21 now so from like this time last year.

22 Q So the 9th District, you were there
23 from 2010 until approximately 2014?

24 A Yeah, I'd say so. Yeah.

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1 Q And then now where are you?

2 A In the 19th District and I've been
3 here for about a year now.

4 Q So now you're in the 19th District?

5 A Correct.

6 Q Besides -- Strike that.

7 Do you have any other employment
8 outside of your CPD employment?

9 A No.

10 Q Do you do your home inspection job
11 still on the side?

12 A Yes.

13 Q So besides CPD, you do the home
14 inspection. Is there any other employment that
15 you do?

16 A No, no, just those two. There are
17 only so many hours in a day.

18 Q True. So you mentioned you went on
19 leave and it was an unpaid leave. Did you make
20 a request for it to be a paid leave and it was
21 denied?

22 A No, no. I knew it wouldn't be a paid
23 leave.

24 Q Have you made any requests from the

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1 City for leave or status change that has been
2 denied?

3 A I don't understand the question.

4 Q So I'm just asking if you've asked to
5 be put on injured, you know, duty or had to
6 take any other leaves that they've denied you?

7 A No.

8 Q Do you currently have any pending
9 grievances with the City or CPD?

10 A No.

11 Q No arbitrations or anything coming up?

12 A Not to my knowledge, no.

13 Q Are you familiar with any the named
14 defendants in this lawsuit, not the plaintiffs,
15 the defendants?

16 A Oh, like the lawsuit, so to speak, you
17 mean?

18 Q Correct.

19 A The only one -- Actually I don't even
20 know who's completely named in it, so --

21 Q That's fair. Let me tell you, so I'll
22 just give you the names and you tell me if you
23 know them and if you do, how you know them?

24 A Okay.

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1 Q Juan Rivera?

2 A No, I don't know him.

3 Q Debra Kirby?

4 A No.

5 Q James O'Grady?

6 A No.

7 Q Nicholas Roti?

8 A No. Now, I know the names but I don't
9 know them personally.

10 Q When I say "know," what I'm really
11 asking you is have you had any conversations
12 with them, that kind of a thing.

13 A Okay, got it. That's fine, yeah,
14 because, of course, I know the names, yeah, but
15 so far it's no up until now.

16 Q So you've never had any conversations
17 with Juan Rivera, Debra Kirby, James O'Grady,
18 or Nicholas Roti?

19 A No. Just seeing them on TV from time
20 to time, but yeah, that's all.

21 Q What about Deborah Pascual?

22 A No, no clue who that is.

23 Q Maurice Barns?

24 A No, no clue.

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1 Q Robert Cesario?

2 A I just found out that he's on this and
3 he's my commander now, but I just found this
4 out now so --

5 Q So Cesario is now your commander?

6 A Right. I literally like met him like
7 two months ago.

8 Q So prior to two months ago, you had
9 not known Robert Cesario or had not met him
10 before?

11 A No. As a matter of fact, when he
12 walked up, I didn't know who he was. I was
13 just explaining to Jeff that I was getting gas
14 and he came up and introduced himself to me. I
15 had no clue who he was.

16 Q Okay, what about Joseph Salemmme?

17 A No.

18 Q And what about Thomas Mills?

19 A No clue.

20 Q So to recap, you don't know any of the
21 people who I have previously mentioned to you
22 with the exception of Robert Cesario who you
23 just met two months ago?

24 A Correct, right.

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1 Q And you've never had any conversations
2 with any of them with the exception of Robert
3 Cesario who you just met two months ago?

4 A Correct, yeah.

5 Q All right, let's get into the
6 affidavit. I've already showed you what is
7 Exhibit A. Had you had a chance to look at the
8 affidavit?

9 A Yes.

10 Q Will you turn to the last page of the
11 affidavit?

12 A Okay.

13 Q Is that your signature on the
14 affidavit?

15 A Yes.

16 Q Did you draft this affidavit?

17 A The attorney did.

18 Q And did you have a chance to review it
19 before signing it?

20 A Yes.

21 Q Were any drafts of the affidavit sent
22 to you to review prior to your coming in to
23 sign the final copy?

24 A Just the e-mail copy that Jeff has

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1 sent me.

2 Q Did you make any revisions or changes
3 to the affidavit that was sent to you?

4 A No.

5 Q So this affidavit that you have before
6 you, you have not made any changes or revisions
7 to this affidavit?

8 A No.

9 Q The date of the affidavit says
10 January 27th, 2015; is that correct?

11 A Correct.

12 Q And you mentioned earlier and I want
13 to go back to that, did you go in to your
14 lawyer's office to sign the affidavit?

15 A Yes.

16 Q And when you were there to sign the
17 affidavit, who else was present?

18 A Shannon was there.

19 THE WITNESS: What's her name, Janet
20 Hannah, right?

21 MR. TAREN: You can't ask me.

22 BY THE WITNESS:

23 A I think that's her name. Janet Hannah
24 was there, and then another guy who was like a

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1 retired commander of IAD was there. I don't
2 remember what his name is, though.

3 BY MS. DAVIS:

4 Q Okay, you said a retired commander?

5 A I'm pretty sure that's what he said
6 his name was. There was like four people
7 there.

8 Q Okay.

9 A There was another assistant there. I
10 don't remember what her name was from the law
11 firm, and then let me see. I was there,
12 Shannon was there. That girl Janet was there.
13 I think, what's his name, Danny -- I'm trying
14 to remember what the two guys' names were. I
15 think Danny was there. I think that was his
16 name.

17 Q So as far as you can remember, Shannon
18 was -- Shannon Spaulding was there, the
19 plaintiff, one of the plaintiffs.

20 A Yeah.

21 Q Danny Echeverria, the other plaintiff?

22 A Yeah.

23 Q Janet Hannah was there?

24 A Yes.

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1 Q And another officer, a retired
2 commander with IAD?

3 A I would know him if I saw him, but I
4 don't know -- I'm pretty sure he said he was a
5 retired commander or lieutenant. I'd never
6 seen him before. I was never formally
7 introduced. He was there and they were
8 talking.

9 Q And then your lawyer and other office
10 staff?

11 A Correct.

12 Q I want to kind of go over that day and
13 when you were signing the affidavit. What
14 conversations did you and Shannon have on that
15 day? What did she say to you and what did you
16 say to her?

17 A Like during the meeting?

18 Q Sure.

19 A I'm trying to remember. I mean, all
20 she told me was just, you know, try to recall
21 everything that I could that happened, you
22 know, pertaining to the affidavit. That was
23 really it, because we met there and we only
24 talked for probably about like around ten

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1 minutes until the actual -- you know, until I
2 started giving the actual statement.

3 Q And what, if anything, did you say to
4 her?

5 A I think the big thing, I was trying to
6 recall the dates of things because, you know,
7 so much time had elapsed. That was pretty much
8 it, you know, trying to remember the dates when
9 it happened.

10 Q Did Shannon help you refresh your
11 recollection about the dates?

12 A I think so. I mean, I think we talked
13 about the dates because, like I said, you know,
14 I didn't have logs written down, you know, from
15 that long ago.

16 Q Anything else you and she talked about
17 on that day?

18 A Not that I can recall. Like I said,
19 it wasn't that long of a period -- I mean, we
20 met at like around like 6:00 o'clock or
21 something, and then we took the -- the attorney
22 took the statement a couple minutes later.

23 Q How long were you at the office in
24 total?

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1 A Probably about, I don't know, maybe
2 about an hour, maybe about an hour and
3 15 minutes from what I recall.

4 Q You said Janet Hannah was there, as
5 well. Did you talk to her?

6 A No. I mean, she -- they were talking
7 amongst themselves. It was real informal. I
8 didn't talk to her. I had never seen her
9 before.

10 Q So prior to that day, you'd never met
11 Janet Hannah?

12 A No. I don't know her.

13 Q And so on that day, you didn't have
14 any conversations with her?

15 A No, because I didn't know her. I
16 wasn't friends with her or anything like that.

17 Q Did you observe Shannon and Janet
18 having any conversations?

19 A Yeah, but it really wasn't even
20 pertaining to the case. It was more like
21 informal stuff that they were talking about.

22 Q Were you a part of those
23 conversations?

24 A No, no, because, like I said, I didn't

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1 know her, I mean. I never her before. They
2 were talking about their kids and stuff like
3 that, so ...

4 Q Nothing about the case that you can
5 recall them talking about?

6 A No, no. I don't remember them talking
7 about any particulars to the case. It was all
8 like personal stuff.

9 Q What about Danny Echeverria? Did you
10 have any conversations with him?

11 A No.

12 Q And I think you said before, you
13 didn't know Danny prior to having seen him on
14 that day?

15 A Right.

16 Q Did you see Danny having any
17 conversations with Shannon or Janet Hannah?

18 A I mean, they were basically just
19 talking -- they weren't talking about the case.
20 They were talking like informal stuff from what
21 I recall. I mean, we were talking about -- you
22 know, the attorney bought us lunch so, I mean,
23 they were talking about where are we going to
24 go for lunch. Everything is closed, stuff like

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1 that.

2 Q I hope he bought you a gourmet lunch.

3 A No. It was a cheap Potbelly sandwich.

4 Q And so after that day, after that hour
5 and a half that you were there, did you have
6 any conversations after that with -- I'll go
7 down the line, Janet Hannah?

8 A No.

9 Q Danny Echeverria?

10 A No.

11 Q And I think you did mention that you
12 had one other conversation with Shannon?

13 A Correct.

14 Q After you met to sign the affidavit?

15 A Right.

16 Q Now, you had mentioned that during
17 that conversation she was talking about her
18 harassment?

19 A Yeah.

20 Q Can you tell me -- Okay, when did that
21 conversation happen, approximately; do you
22 remember?

23 A You're talking about the conversation
24 that I had after this?

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1 Q Yes.

2 A I mean, probably, my God, I mean, this
3 was January -- I mean, probably within a month
4 afterwards.

5 Q So you're thinking approximately late
6 February of this year?

7 A I mean, from what I could -- -- I
8 would have to look at my phone records, you
9 know what I'm saying? I didn't have that
10 information prepared.

11 MR. TAREN: Just focus on the
12 question.

13 THE WITNESS: All right, all right.

14 BY MS. DAVIS:

15 Q So after you signed this affidavit in
16 January, you think you talked to Shannon about
17 a month afterward; is that right?

18 A Yeah, from what I can recall.

19 Q And did she call you?

20 A Honestly I don't remember.

21 Q You don't recall if you called her or
22 she called you?

23 A No, I honestly don't.

24 Q Do you remember how long you talked to

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1 her?

2 A How long, oh, no.

3 Q It was a telephone conversation?

4 A Yeah.

5 Q So it wasn't a face-to-face?

6 A No. It was on the phone.

7 Q And it was just you and she on the
8 phone?

9 A Correct.

10 Q And what was the nature of the
11 conversation? What did she say to you?

12 A I mean, she thanked me for doing the
13 affidavit, for coming down on my own time and
14 actually, it's funny because we talked about --
15 I'm retiring, you know, it's going to be the
16 plan here anyway and she asked me about my
17 retirement because I have a house in Costa
18 Rica; so we were actually kind of talking about
19 that. I'm going to move down there, because
20 her daughter has been to my house and she was
21 asking me about it and she was talking about
22 moving. That was part of the conversation, but
23 the main thing was she just said thanks for
24 coming down, and she goes you're probably going

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1 to have to follow up meaning now and she says,
2 you know, just will you please do that.

3 Q Anything else she said to you?

4 A No. She just mentioned how she was, I
5 mean, harassed, you know, during this time
6 period and -- because I asked her, I said, how
7 are you surviving? You know, what are you
8 doing right now? I mean, are you working?

9 She says, no, I'm not. I'm
10 probably going to have to apply for disability
11 and she says, you know, basically the doctors
12 feel like I have -- I think she said post
13 traumatic stress disorder and she says she
14 can't go back to work. She was probably going
15 to have to apply for disability. You know, I
16 went through a lot during this time frame; but,
17 I mean, it was not much more than that.

18 Q Did she give you any specifics about
19 the harassment that she allegedly endured?

20 A I'm trying to remember what she said.
21 Something about the effect that -- and I don't
22 know who it was either. I mean, I don't
23 remember -- with all the names that you read
24 off, I don't remember who she had referenced in

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1 it, but basically she said that she was
2 threatened at work.

3 Q When you say "threatened at work,"
4 threatened by a superior, a supervisor?

5 A Yeah, a supervisor.

6 Q By one supervisor or more than one
7 supervisor?

8 A I don't remember because it was
9 basically she had talked about what was on the
10 news, that I had seen on television. That's
11 basically what she said, you know, they had
12 called her a rat and she was, you know, worried
13 for her life.

14 And I had said to her, I was
15 really surprised because, I mean, I really
16 thought that she was going to like move up, you
17 know, rankwise, you know. I thought for sure
18 because at this time the sergeant's test
19 results were coming out and I said, God, I
20 thought by this time that you would be a
21 sergeant because she was like a real
22 studious-type person and for lack of a better
23 term, into the job, okay.

24 I, on the other hand, I do my

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1 job, don't get me wrong, but I'm not into being
2 the police. I go to work. I do my thing and I
3 go out. A lot of people like her, in my
4 opinion, she was into the police. You know
5 what I'm saying? She was the kind of person
6 who would go home and take her work home with
7 her.

8 I mean me, my wife doesn't even
9 know I'm the police besides me getting up in
10 the morning, you know. To kind of extrapolate,
11 like all of her friends, you know, when they do
12 find out I'm a police officer, it's always
13 like, well, like a full-time police officer and
14 I would have to show them my star. And they're
15 like, oh, wow, I never knew you were the
16 police.

17 Shannon was the kind of person
18 who, you know, would have the little police car
19 in her house, you know, with the plaques on the
20 wall. I have none of that in my house, but the
21 point I'm getting at is, she was the type of
22 person who I had assumed was going to move up.
23 Where with me, I didn't even take the last
24 test. I've got other stuff going on.

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1 Q So when she talked to you -- And I
2 want to just make sure I really get all of the
3 conversation that you had as much as you
4 remember about the conversation.

5 A Uhm-hmm.

6 Q So she told you she was threatened by
7 a supervisor; you don't remember the name of
8 the supervisor?

9 A I don't even think she told me because
10 I don't know any of those people, so it was
11 kind of irrelevant.

12 Q And she told you that she was called a
13 rat?

14 A An IAD rat.

15 Q An IAD rat?

16 A Yeah.

17 Q Did she talk to you about how any of
18 that affected her or any of that kind of thing?

19 A Well, I mean, she told me, she said,
20 you know, imagine going to work and the very
21 people who are supposed to be part of your team
22 and protect you, I'm getting threats from like
23 cold shoulders, basically is what she said like
24 from other officers on her team, you know, and

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1 bosses saying that, you know, you're not going
2 to get backed up when you go out there. I
3 mean, she basically told me she was stressed
4 out and didn't want to go to work anymore and,
5 like I said, she basically told me that she had
6 post traumatic stress disorder from it and she
7 couldn't work anymore.

8 Q Did she tell you who told her that she
9 wouldn't be backed up if she went out in the
10 field?

11 A You know what, I think she did but,
12 again, I don't know who it was, so it didn't
13 stick with me, you know what I mean?

14 Q Did she tell you that she had ever had
15 any instances of anybody not backing her up in
16 the field?

17 A We didn't talk about that. No, she
18 didn't it mention either way.

19 Q Did she talk to you about who she
20 thought was giving her the cold shoulder, so to
21 speak?

22 A I mean, just other team members. She
23 told me that she had gotten reassigned
24 basically from like the team she was on. She

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1 basically got dumped is what we call it, you
2 know, when you've got a good spot and they send
3 you somewhere else. She got dumped to -- I
4 don't even remember where she got dumped to
5 because, I mean, I wasn't part of that unit,
6 but she basically told me that she got dumped
7 from wherever she was at and got moved
8 somewhere else against her wishes, in other
9 words.

10 Q So when you say she told you she got
11 dumped, you took that to mean she got
12 reassigned within the unit she was already in?

13 MR. TAREN: Objection.

14 BY THE WITNESS:

15 A All I know is that she got moved from
16 the spot that she was at to somewhere else.
17 She didn't say whether it was in another unit
18 or another assignment -- you know, like another
19 unit. She just basically said she got -- The
20 spot she was at, she lost that spot.

21 BY MS. DAVIS:

22 Q So you don't know if she was still in
23 the same unit or a different unit?

24 A She may have mentioned it; but, like I

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1 said, not being part of it, you know, it may
2 have went in one ear and out the other.

3 Q Did she ever talk to you about her
4 specific job assignments and the kinds of cases
5 she was assigned to?

6 A Well, it's funny because I would ask
7 her and she basically said that she couldn't
8 talk about the like kind of work that she did.
9 You know, that was the impression that I got.
10 She's like, no, basically saying that she's got
11 open cases and things like that that she can't
12 discuss -- I know that she did undercover stuff
13 with narcotics.

14 You know, I mean, the one time
15 that I had spoken with her, she said that, that
16 she would wear -- This was actually before
17 this, though. This was like when she had first
18 gotten there when I talked to her before any of
19 this came down, you know, because I was friends
20 with her, you know, and I still am. I just
21 don't talk to her as much because we don't work
22 together anymore.

23 MR. TAREN: I'm going to suggest you
24 wait for a question because we're jumbling time

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1 frames and then focus on the question and
2 answer the question.

3 THE WITNESS: Okay.

4 BY MS. DAVIS:

5 Q So you were saying -- Okay, let's go
6 back to this conversation, this last
7 conversation. I want to make sure that we
8 talked about everything that you talked about
9 with her during that conversation.

10 Did she say anything else to you
11 during this conversation that you haven't told
12 me about?

13 A No, that is pretty much all I can
14 recall.

15 Q Did she talk to you at all about
16 wanting to work a different shift within the
17 fugitive unit?

18 A No. She did not mention that to me.

19 Q Did she give you names of any
20 particular people who she was having issues or
21 problems with that you can recall?

22 A No. Like I said, even if she did, I
23 don't know any of the people so, I mean, it's
24 irrelevant. If she did, it went in one ear and

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1 out the other. I don't recall her mentioning
2 anyone's name in particular.

3 Q Did she offer you anything in return
4 for having given your affidavit?

5 A No. I was just telling him. I said,
6 I'm still out of my parking fee from the last
7 time. The answer is no.

8 MR. TAREN: Don't tell counsel
9 anything you told me.

10 THE WITNESS: I know, it's privileged,
11 right.

12 BY MS. DAVIS:

13 Q And so she didn't offer you any money
14 or anything saying that if she was to prevail
15 in her lawsuit, she would share any of the
16 proceeds with you?

17 A No.

18 Q Now, you said that you are friends
19 with Shannon, and I want to make sure I
20 understand the time period by which you've been
21 friends. When did you first meet Shannon?

22 A Literally like right before I got on
23 the job. I came on in October of '95 and I
24 probably met her about -- maybe about July of

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1 '95.

2 Q And how did you meet her?

3 A Basically what happened was she was
4 buying a police scanner because she was coming
5 on the job and what happened was, she went
6 to -- It's kind of funny how we met. She went
7 to a Radio Shack to get the police scanner
8 because she wanted to start to listen to the
9 police radio and listen to calls. I was
10 friends with the manager there.

11 She bought the scanner and
12 didn't know how to program it and my friend --
13 I also had a police scanner, too, because I was
14 doing the same thing, listening to the police
15 scanner. I had learned how to program mine and
16 what happened was, she wanted to get it
17 programmed, so she said, hey, can you do it.

18 Long story short, my friend
19 called me up, he said, hey, I've got someone
20 here who wants to do this. Maybe you can make
21 a couple bucks off of her. She's going to be
22 the police like you're going to be. What
23 happened was he gave her my number. I said,
24 I'm not going to charge you for it. I'll just

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1 do it for you. I said, hey, one day we might
2 be partners.

3 I had never met her before. It
4 was more of a joke. Then she came over. I
5 programmed it, and then I was starting the
6 academy in a couple months and then she started
7 the academy in like I think March of the
8 following year. So we were in the academy
9 together. Literally when I was leaving the
10 academy, we overlapped by about three weeks, so
11 when I was getting ready to leave, she was
12 starting so, I mean, we kind of became friends
13 like that because of the job.

14 Q Okay, and then once you left the
15 academy, did your friendship continue? Did you
16 talk to her?

17 A Yeah.

18 Q And when you talked to her, did you
19 talk to her would you say monthly, weekly,
20 daily?

21 A It's funny. It would vary. It would
22 be like hot and cold. Sometimes we would go
23 out and we would talk. We'd go out like, you
24 know, once a week on a Friday night being new

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1 police officers talking stories, and then I
2 wouldn't talk to her for two or three months.
3 You know, it was basically like that. You
4 know, we talked for like the first three years
5 of the career kind of on and off, and then
6 that's how we wound up hooking up and going
7 into housing together.

8 Q And so when you would talk to her in
9 those early days when you were -- started on
10 the force, would anybody else be with you guys
11 when you would go out?

12 A One of her friends went out with us a
13 couple times but I would like know her name if
14 I heard it, but I haven't talked to her in, oh,
15 God, 15 years. She went out with us a couple
16 times. If I saw her or heard her name, I would
17 know it, but I can't tell you right now.

18 Q Were you guys ever romantically
19 involved?

20 A No.

21 Q Just friends?

22 A Just friends.

23 Q And then how did it get to be that you
24 all got to public housing, you two together?

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1 A What happened was she was assigned --
2 From my recollection, she was assigned to the
3 2nd District, and her -- one of her sergeants
4 was Glen Evans who is now a commander -- the
5 last I heard he was a commander -- and he
6 was -- he got an offer, Glen Evans did, that's
7 the sergeant, to go work in public housing
8 under then Commander Tolliver.

9 And then -- she needed a partner
10 and then she asked me, you know, because it was
11 kind of like, hey, you helped me early on with
12 the scanner and we were friends and stuff like
13 that, would you want to come go and work in
14 housing and it was going to be undercover,
15 plainclothes, and unmarked cars, things like
16 that; so I said yeah, what do I've got to lose?
17 That's how it happened. That's how we wound up
18 becoming partners.

19 Q And how long were you and she
20 partners?

21 A I don't know. Probably about maybe
22 like about two years, I would say, a year and a
23 half, two years.

24 Q And then how did it come to be that

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1 you guys were no longer partners?

2 A I'm trying to think who the sergeant
3 was at the time. Basically the sergeant --
4 Give me a couple of seconds to think. I'm just
5 trying to think of who was the sergeant at the
6 time. I think the sergeant wanted to change
7 people on the teams, and basically I was asked
8 if I wanted to stay on the team and she wasn't
9 asked to stay.

10 Q Do you know why she wasn't asked to
11 stay on the team?

12 A I'm trying to remember. I don't
13 recall why.

14 Q Did you and she have any conversations
15 about her not being asked to stay on the
16 team -- Let me rephrase that.

17 Did you and she have any
18 conversations about her not being asked to stay
19 on the team?

20 A I'm trying to remember. No, not that
21 I recall, nothing that comes to mind.

22 Q Did she have a good relationship with
23 other folks on the -- in the unit?

24 MR. TAREN: Objection.

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1 BY THE WITNESS:

2 A To my knowledge, she got along with
3 everybody. I mean, I never had any problems
4 with her.

5 BY MS. DAVIS:

6 Q So as you sit here today, you don't
7 know why she wasn't asked to stay on the team
8 in the public housing unit?

9 A They were changing to -- I'm trying to
10 think of what it was called. Basically what
11 they were doing is changing the housing model,
12 so to speak, so everything at the time was
13 plainclothes. Everybody was kind of like the
14 same, if you will.

15 And basically what happened was,
16 they had opened up housing to what they call a
17 super bid and -- well, I don't know if that's
18 what it's called, but basically what they did
19 was they had like about 150 openings and they
20 opened it up citywide; so instead of it being
21 like a closed-knit unit, the -- what do you
22 call them -- they're gone now. They're
23 defunct. Well, the public housing police, I
24 don't know the exact name of what they were

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1 called.

2 But basically they had their own
3 police department and we were kind of
4 supplemental. So what happened was, they got
5 disbanded because I think -- they were federal
6 if I'm not mistaken, but they got disbanded, so
7 what happened was, they shut that unit down and
8 then as a consequence, they made Chicago's
9 bigger. Does that make sense?

10 Q Yes.

11 A So basically they -- we supplemented
12 them initially, but then what happened was we
13 took over. "We" being the Chicago Police.
14 They disbanded and they opened up more units.
15 So then what they said was, we can't have
16 everybody here plainclothes working undercover.
17 We need to have like half the unit be in
18 uniform, so basically I was asked if I wanted
19 to come onto the team to work in uniform and
20 then she wasn't.

21 Q And so after you all stopped being
22 partners, how often did you talk to her after
23 that?

24 A Oh, I would see her at work every day.

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1 Q Then I'm a little confused. So you
2 would still -- She was still working in the
3 same unit with you even though she wasn't asked
4 to still be on the team?

5 A Yeah. Let me clarify it. So the unit
6 had multiple teams. So there was units that
7 were -- I mean, they had all these crazy names,
8 but they had units that were designed to like
9 just sit at the building and then they had
10 units that would go there undercover, so
11 everybody had like different mission.

12 So like the unit -- not the
13 unit, strike that. The team that I was on, we
14 were doing more undercover stuff, you know.
15 That's what we were doing, and the unit that --
16 I'm sorry, the team that she got moved to was
17 basically in uniform on patrol is basically how
18 it was.

19 Q I understand. So you all weren't
20 partners anymore but you were still --

21 A In the same unit.

22 Q -- in the same unit?

23 A Correct.

24 Q So you would still see her at work

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1 every day?

2 A For the most part, yeah.

3 Q And for how long -- Let me strike
4 that.

5 So you and she were in the same
6 unit until approximately when?

7 A Until I left.

8 Q And I think you told me you left that
9 unit in 2004?

10 A From what I recall. Again, I would
11 have to check the records to be 100 percent
12 accurate.

13 Q And then after 2004, did you still
14 have daily contact with her or regular contact
15 with her?

16 A No, no. Once I left the job and took
17 my leave of absence, I didn't really have
18 contact with anybody. I would talk to her, you
19 know, maybe once every couple of months. You
20 know, hey, how is it going? You know, at the
21 time I was busy doing my thing and she was
22 doing her thing, but yeah, I didn't talk to her
23 like I had before.

24 Q And during that time between the time

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1 that you left in 2004 and the time when you --
2 Let me strike that.

3 So after 2004, did you have any
4 conversations with her wherein she talked to
5 you about feeling threatened or being unhappy
6 with her current unit or any of those kinds of
7 things?

8 A At that time, not that I remember.

9 Q Do you recall the first time that you
10 and she had a conversation wherein she relayed
11 any information to you about being harassed or
12 alleging that she felt threatened or any of
13 those kinds of things?

14 A You know, it was right about before --
15 it was right about before she made like the
16 press release.

17 Q Okay, so right before the press
18 release. Do you remember approximately when
19 that was?

20 A Oh, boy, I'll be honest. I don't even
21 remember the year now.

22 Q And do you remember what she told you
23 at that point?

24 A I think at the time that's when she

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1 had called me up and -- because I would call
2 her from time to time and, you know, ask her,
3 you know, what was she doing, what was her job
4 and stuff like that. And I think like the
5 first conversation we had like when she was
6 having problems, she had basically said that
7 like one of her supervisors had threatened her
8 over the -- I don't want to give you wrong
9 information. Give me one second. I'm just
10 trying to think.

11 MR. TAREN: Don't speculate. Just
12 tell her what you recall.

13 THE WITNESS: Yeah, I'm trying to
14 recall.

15 BY THE WITNESS:

16 A I'll be honest with you. I really
17 don't remember the details of that
18 conversation.

19 BY MS. DAVIS:

20 Q Okay, that's fine if you don't recall.
21 What I'm trying to make sure that I get from
22 you is any conversations that she had with you
23 and the details wherein she described what
24 harassment or threats she was having. Do you

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1 recall any of those conversations?

2 A I'm trying to think about the
3 particulars of what she said. I remember her
4 telling me that she was accused of being an IAD
5 rat. I mean, that comes to mind. I remember
6 her telling me that.

7 Q Other than being -- her saying she was
8 accused of being an IAD rat, do you remember
9 any other specifics of any threats or any other
10 conversations?

11 A No, not in particular.

12 Q I want to turn to your affidavit and
13 kind of go through it just a little bit, not
14 every point but a few of them in there.

15 A Okay.

16 Q So as you have reviewed this
17 affidavit, as you sit here today is it still
18 true and accurate everything that's in the
19 affidavit?

20 A Yeah. To the best of my recollection,
21 yeah.

22 Q And are you aware that you are
23 swearing under penalty of perjury that
24 everything in this affidavit is true and

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1 correct?

2 A Correct. The only thing I'm not 100
3 percent sure of is the actual date, like I told
4 you before. Like I said, I would have to have
5 reference work records to be 100 percent sure.

6 Q But everything else besides maybe the
7 date --

8 A Yes.

9 Q -- you are saying is true and
10 accurate?

11 A Yes, yes.

12 Q I want to turn your attention to
13 paragraph 8.

14 A Okay.

15 Q If you'll take a look at that.

16 A Okay.

17 Q In this paragraph 8 where you make the
18 statement: One day I was confronted by
19 Sergeant Watts about there being no arrests and
20 no inventory -- I'm sorry.

21 One day I confronted Sergeant
22 Watts about there being no arrests and no
23 inventory for money or narcotics entered into
24 the official inventory log. You go on to say:

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1 Sergeant Watts told me that half the time he
2 was trading up for information which would lead
3 to bigger busts and more important narcotic
4 suspects.

5 Was there anybody else present
6 during that conversation besides you and
7 Sergeant Watts?

8 A I think Mohammed was there during this
9 time. Yeah, because I remember Mohammed
10 basically telling me I shouldn't challenge the
11 sergeant, so it was Mohammed, Kalatt was his
12 name.

13 Q I'm sorry. Mohammed Kallat?

14 A I'm sorry. His first name is Kalatt,
15 K-a-l-a-t-t, if I remember correctly. The last
16 name is Mohammed.

17 Q So you believe he was there during
18 that conversation?

19 A Oh, I know he was there during the
20 conversation because of what was said
21 afterwards.

22 Q Anybody else present during this
23 conversation?

24 A Not that I recall.

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1 Q Paragraph 9, it says: Sergeant Watts
2 began screaming at me, and it goes on to say
3 what he said while he was screaming at you.
4 Was anybody else present during that
5 conversation?

6 A I can't remember if anybody else was
7 there. This was the same conversation where --
8 Well, I remember Mohammed was there.

9 Q So in paragraph 8 and paragraph 9,
10 this is the same conversation?

11 A Yes, yes.

12 Q So Kalatt Mohammed was there during
13 this conversation?

14 A Yes, correct.

15 Q And what about paragraph 10? It says:
16 Then Sergeant Watts told me that the commanding
17 officer, Lieutenant Jimmy Spratt, wanted to
18 talk to me. Was that the same --

19 A It was the same day but it was later
20 in the day.

21 Q And so later in the day -- And so when
22 he told you that, was anybody else present?

23 A No, no. I don't remember anybody else
24 being present.

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1 Q Okay, paragraph 11, it says: At that
2 time I informed Lieutenant Spratt about the
3 missing inventory.

4 Was anybody else present during
5 that conversation?

6 A No. This was in his office.

7 Q So it was just you and Lieutenant
8 Spratt?

9 A Correct.

10 Q So number 12 where it says:
11 Lieutenant Spratt asked me whether I had gone
12 to the Internal Affairs Division about this,
13 and you responded that you had not, that was
14 still during the conversation in his office?

15 A Correct.

16 Q You responded that you had not gone to
17 Internal Affairs about your suspicions; is that
18 right?

19 A Right.

20 Q Why didn't you go to Internal Affairs
21 about your suspicion?

22 A Because I had already gone to the FBI
23 on previous stuff from years before and nothing
24 basically happened from it, nothing came out of

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1 it, and I knew that there were people in the
2 unit that knew people at IAD.

3 Q Paragraph 13, where it says Lieutenant
4 Spratt then told you and it's all here, what he
5 said to you. Really what I wanted to know, was
6 anybody else present during the time that you
7 were talking to him and he said those things in
8 paragraph 13?

9 A Oh, not inside the office, but what
10 happened was Shannon was outside which I found
11 out after the fact because she heard the
12 argument; but when I was in the office, she
13 wasn't inside the office.

14 Q So I just want to make sure I'm clear.
15 So for paragraph number 12, you were inside the
16 office with Lieutenant Spratt?

17 A Correct.

18 Q In paragraph 13, where it says
19 Lieutenant Spratt then told me, you're accusing
20 my sergeant and a fellow officer of stealing.
21 Well, I don't believe you. You should have
22 gone to a supervisor the same day it happened,
23 and he also said, you know what, I think you're
24 the corrupt one and that's why you didn't go to

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1 the supervisor.

2 You're saying that Shannon
3 Spaulding was there to hear this part of the
4 conversation?

5 MR. TAREN: Objection to the point to
6 hear.

7 BY THE WITNESS:

8 A Well, when I was in the office, she
9 was outside, but I didn't know it at the time.

10 BY MS. DAVIS:

11 Q So it's your understanding that she
12 heard the conversation that happened in
13 paragraph 13?

14 MR. TAREN: Objection. You can
15 answer.

16 BY THE WITNESS:

17 A No. She told me she heard it. She
18 came up to me afterwards.

19 BY MS. DAVIS:

20 Q So Shannon told you that she heard the
21 conversation you were having with Spratt, the
22 information that's in paragraph 13?

23 A Oh, yeah, because he was screaming at
24 me at the time.

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1 Q So let me make sure that I understand
2 correctly. At the point where he was screaming
3 at you, she said she heard what he was saying
4 when he was screaming?

5 A I don't know what -- the whole details
6 of what she heard. I mean, I can't say -- I
7 can't testify as to what she heard.

8 Q Of course.

9 A But she came up to me afterwards and
10 she asked me, she says, what happened? I heard
11 him yelling at you, blah, blah, blah, blah,
12 blah, blah, blah; so she indicated that she was
13 outside in the hallway because he didn't close
14 the door or anything.

15 Q I see, so the door was open?

16 A Oh, yeah. Yeah, there was like no
17 shame in his game in my opinion.

18 Q All right, so paragraph 14, the
19 conversation in paragraph 14 happened right
20 after the conversation in paragraph 13; is that
21 right?

22 A Yeah. This was all during the same
23 time frame.

24 Q All during the same time frame?

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1 A Yeah.

2 Q And paragraph 15 -- So if I'm correct,
3 paragraph 13, paragraph 14, and paragraph 15
4 all happened right after each other; is that
5 correct?

6 A Correct.

7 Q So the same day?

8 A Same day.

9 Q The same time?

10 A Right.

11 Q And when Shannon told you that she
12 heard what was happening, was it your
13 understanding that she heard everything that
14 was happening from paragraph 13 all the way to
15 paragraph 15?

16 A Yeah, because right after the
17 conversation that I had with Spratt, when I
18 walked out in the hall and she was like what
19 happened, she goes, blah, blah, blah, and we
20 had our conversation then.

21 Q And besides Shannon, was there anyone
22 else around within earshot of this
23 conversation?

24 A Not that I know of because, like I

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1 said, I didn't even know she was out there. I
2 didn't know she was listening at the time.

3 Q So moving on to paragraph 19.

4 A Okay.

5 Q It says: Lieutenant Spratt began
6 screaming at me because he thought I went to
7 headquarters to report Sergeant Watts to IAD.
8 I handed Lieutenant Spratt my leave-of-absence
9 papers and walked out.

10 When approximately did that
11 happen?

12 A That was probably about, oh, maybe
13 like about three or four days later.

14 Q And was anybody around when that
15 conversation happened?

16 A Not that I recall, no.

17 Q And then after that, you took your
18 leave of absence; is that right?

19 A Yes, ma'am.

20 Q And when you returned to work, it
21 says: I returned to work, in paragraph 21,
22 being assigned to the 22nd District and I
23 worked for a couple of years with no real
24 issues; is that right?

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1 A Correct.

2 Q So as a result of your having -- Let
3 me strike that.

4 Did you ever go to the IAD or
5 the FBI about your suspicions about Sergeant
6 Watts?

7 A No. I was done.

8 Q When you returned to work, were there
9 any repercussions or problems that you had from
10 your having accused Sergeant Watts or talking
11 to Lieutenant Spratt about your suspicions?

12 A Not for me there wasn't.

13 Q So then in 22 it says: An indictment
14 came down for Sergeant Watts, right?

15 A Correct.

16 Q Then 23, it says: Sometime after
17 Watts's indictment, Shannon Spaulding and I
18 began to speak more frequently in regards to
19 her safety?

20 A Yes.

21 Q Now, we've already talked about I
22 think two conversations that you had?

23 A Yeah.

24 Q In this paragraph 23, what

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1 conversation are you referring to where you're
2 saying you talked to her frequently in regards
3 to her safety? Can you recall for me any of
4 those conversations?

5 A You mean like the dates or the
6 subject?

7 Q The substance of the conversations.
8 If you know the dates that's great but really
9 the substance of the conversations.

10 A Well, basically -- Yeah, well,
11 basically after she made the press release, you
12 know, that's how I found out about it. I was
13 watching the news just like everybody else. I
14 said, oh my God, that's my old partner.

15 Q Okay, so after the press release and
16 after the news report, you started talking to
17 her more frequently about her safety. Is that
18 fair to say?

19 A Yeah. Like I said, we have spoken, I
20 think, maybe twice about it.

21 Q And did she tell you she feared for
22 her safety?

23 A Yeah. She said she feared for her
24 safety, didn't want to go to work, and, you

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1 know, told me that she had, you know, post
2 traumatic stress disorder from all of the stuff
3 that she's going through.

4 Q This paragraph also says: I called
5 Shannon frequently to make sure she was coping
6 with the situation.

7 So I'm just trying to get a feel
8 for the number of conversations. You said you
9 recall approximately two conversations?

10 A Right.

11 Q Can you tell me if there were more
12 than two conversations? I don't expect you to
13 know the exact number but approximately.

14 A I mean, it was a few. See, the thing
15 is, I really didn't talk to her that much. You
16 know, she's got her life. I've got my life and
17 we weren't in the same units anymore, so I went
18 from pretty much not talking to her much to
19 talking to her more; but, I mean, probably --
20 there was one time that she came up to -- I
21 used to work in the -- well, as far as
22 assignments go, I used to work in the 2nd
23 District in the summer bike detail, so she had
24 came up to the lake one time and we had talked

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1 a little bit, and that's when she -- so that
2 was like a third conversation. That was
3 actually a face-to-face conversation that we
4 had.

5 Q Approximately when was that?

6 A Let me see, so this is 2015, I was
7 working with my partner Bill Spiker, so I can
8 reference it off of that time frame. I'm just
9 trying to think. Just give me one second.

10 I'm pretty sure it was summer of
11 2013. I would have to check and see when I was
12 working with my partner Bill because that
13 was -- she came up and we were there together
14 and I had introduced him to her. I said hey,
15 Bill, this is, my former partner I used to work
16 with in housing. So I remember who I was with
17 at the time. I just couldn't tell you what
18 year it was without referencing when that
19 detail was that I did.

20 Q Okay, so whenever you were with Bill
21 Spiker as your partner maybe around the summer
22 of 2013?

23 A Yeah, correct. And if it wasn't 2013
24 because this is '15. Last year was '14. It

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1 either has to be '12 or '13, but I mean, I know
2 it was either '12 or '13. It was in the
3 summertime, so --

4 Q And who was she with, anybody?

5 A No. She was by herself.

6 Q What did she say to you?

7 A I mean, basically more of the same
8 thing, that she was -- didn't feel safe at work
9 anymore. She -- I think I remember her saying
10 that it her sergeant or whatever or lieutenant,
11 you know, basically that people aren't going to
12 back you up anymore. You're an IAD rat. And,
13 of course, she talked about Sergeant Watts and
14 what am I supposed to do. She had said that
15 she went to like when she had initially found
16 out about Sergeant Watts, she told me that when
17 she first found out about it, she went to
18 whoever the boss was and that's when she let
19 them know and whoever she told, who it was I
20 don't remember the name, but basically like,
21 you know, I don't want to hear it. That's what
22 she said to me, that whoever she went to didn't
23 want to hear it.

24 Then she felt like, well, I'm in

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1 the middle now because here I've got corruption
2 of a sergeant who used to be my old sergeant or
3 sergeant I used to work with in housing and
4 now, you know, I'm in the middle. What do I
5 do? Like she was basically saying that the CPD
6 bosses don't want to hear about it because she
7 is like doing stuff with the FBI task force.
8 Don't quote me on where she was, but -- and
9 she's like now I'm in the middle. And she
10 goes, what would you have done.

11 I said, I go, you already know
12 what I would do. I said I already went to the
13 feds when I found out about corruption. You
14 know, I said, of course, I think you're going
15 to do the right thing. I said it's not worth
16 putting your life either physically or
17 financially, you know, or anything like that in
18 jeopardy because of someone else. I said -- I
19 go, even though what I did, I said, I would
20 still do it again. I found out about
21 corruption and I went right to the FBI. So I
22 said, of course, what you're doing and
23 experiencing, I would have done the same thing.

24 Q Okay, I want to make sure I understand

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1 what you were just saying about being her in
2 the middle. I'm not sure I quite get that. So
3 when she was talking to you and saying that she
4 didn't feel safe at work anymore, right?

5 A Yes.

6 Q Can you break it down for me a little
7 bit better? What was the reason she didn't
8 feel safe in her current unit?

9 MR. TAREN: Objection.

10 BY THE WITNESS:

11 A She said because basically her cover
12 got blown, so to speak, and that people knew
13 that she was the one who had the information
14 about Watts and that that word had gotten out
15 and now they were referring to her as the rat.
16 She was getting the cold shoulder at work. She
17 was told by bosses that, you know, people
18 aren't going to back you up, that you should
19 just leave here, things of that nature.

20 BY MS. DAVIS:

21 Q Okay, so she was saying that people
22 now in her current unit knew that she had
23 information on Watts; is that right?

24 A From what I recall her saying, yes.

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1 Q And when she was asking you what you
2 would do, that was in reference to what?

3 A Oh, to Watts. You know, she was
4 basically asking me like a hypothetical, you
5 know, what would you have done if you were in
6 my position, and I laughed and I said -- I'm
7 like, are you kidding? I said, you already
8 know what I did, so ...

9 Q And in terms of the time frame for
10 this, when you were talking to her about the
11 hypothetical what you would have done and that
12 kind of thing, had Watts already been indicted
13 at that point?

14 A Yes.

15 Q So in some respects she was asking you
16 if you thought she had done the right thing; is
17 that right?

18 MR. TAREN: Objection.

19 BY THE WITNESS:

20 A Well, I mean, I guess so. Basically
21 she was asking me, you know, it was more like,
22 God what would you have done with it being a
23 supervisor for the police?

24 And, like I said, my response to

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1 her was, I'm like, why are you even asking me.

2 You already know what I would do.

3 BY MS. DAVIS:

4 Q What's your understanding of the role
5 she played in Watts's indictment?

6 MR. TAREN: Objection, foundation.

7 BY THE WITNESS:

8 A From what I was explained was that she
9 had witnessed him on video or something like
10 that. She was watching from a surveillance
11 point and she recognized Watts. Again, that's
12 what I recall her telling me.

13 BY MS. DAVIS:

14 Q Witnessed him on video doing what?

15 A I think he was doing a drug --
16 suspected drug transaction or something like
17 that. I'm trying to remember the particulars
18 of it, but I know that she had either witnessed
19 it or heard it on a wire. I don't remember
20 which it was, but I know that she either had a
21 tap on a phone or she had witnessed something,
22 something to that effect.

23 Q And when she had that conversation
24 with you, did she say anything else to you that

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1 we haven't already talked about?

2 A Well, I mean, nothing really about
3 this. I mean, it was other personal
4 conversation but --

5 Q Well, when you say "personal
6 conversation," what else did she say?

7 A Personal-wise?

8 Q Yes.

9 A When are you leaving the job? The job
10 is not safe anymore, just things of that
11 nature.

12 Q Did she talk anything about her mental
13 health or any of those kinds of things?

14 A Oh, yeah. Yeah, she told me, I can't
15 sleep at night. She says, you know, basically
16 I'm paranoid. You know, she was like, you
17 know, I'm afraid if I go to my car. I'm using
18 my remote start more now just to make sure that
19 the car doesn't blow up, things like that.
20 That's what she said to me.

21 Q And was she able to give you any
22 specific instances at that time where anybody
23 had failed to back her up or had made any other
24 threats to her?

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1 A No. It was more -- I mean, again,
2 what she related to me was just the -- well,
3 like I said earlier, like it felt like she was
4 getting the cold shoulder from everybody. She
5 didn't say if there was -- She didn't relate
6 any specific instance where this one didn't
7 show up or that one didn't show up. She just
8 basically told me that she could feel the
9 difference how people were treating her.

10 Q And paragraph 24?

11 A Okay.

12 Q The last paragraph, it says: Around
13 that time while I was working a sergeant who
14 worked with Sergeant Watts in the second
15 district approached me and asked how I was.
16 The sergeant also told me, "tell Shannon
17 Spaulding to be careful and to park her car in
18 the garage." He said, "Because if these
19 officers could put a pipe bomb under her car,
20 they would."

21 So who was the sergeant who told
22 you that?

23 A You know what? It was a sergeant who
24 was in passing in plainclothes. I had seen him

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1 around. I don't know who it is by name.

2 Q What did he look like?

3 A A male white, probably around -- I
4 don't know at the time, probably like around
5 30, 35-ish. They were in the station
6 processing an arrest.

7 Q And which station were they in?

8 A In the 2nd District.

9 Q Do you know if it was a sergeant who
10 was stationed in the 2nd District?

11 A No, no. They were an outside unit
12 because that's where like when you make an
13 arrest outside of the unit, you do it where --
14 like if you're an outside unit, you process the
15 arrest wherever the arrest was at.

16 Q So the arrest was in the 2nd District?

17 A I just saw them in the station. I
18 don't even know. I can't even say that they
19 were on an arrest, so strike that. I shouldn't
20 say he was on an arrest.

21 Q Any other information you can provide
22 that would help identify who that person was?
23 For example, was he with someone else?

24 A No, not that I can recall. I don't

Deposition of Michael Spaargaren - August 13, 2015

1 remember the details. I'm trying to think.

2 No, he was in plainclothes so no name tag on.

3 Q Was anyone else around to hear him say
4 that, the statement in paragraph 24?

5 A No. I just happened to be up at the
6 front desk at the time and he was at the front
7 desk, as well.

8 Q And no one else was around?

9 A I'm sure there were other people
10 around but no one who I remember. I was an
11 outside unit myself, too, because I was doing
12 the bike detail.

13 Q Was your partner with you at that
14 time?

15 A No, no. I was just up at the front
16 desk checking my e-mail or something.

17 Q When he said that, did it appear that
18 he was joking?

19 MR. TAREN: Objection.

20 BY THE WITNESS:

21 A Well, I mean, I guess it was taken
22 lighthearted, you know what I mean? It wasn't
23 like a serious thing. I didn't take it as such
24 to call her and say, hey, park your car in the

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1 garage. Someone is going to put a bomb under
2 your car, you know, so I didn't take it like I
3 don't want to say a serious threat but it was
4 kind of like more in jest, I think.

5 BY MS. DAVIS:

6 Q So you didn't call Shannon and tell
7 her what the sergeant had told you?

8 A Well, did I call her at this time, no.
9 I think I had mentioned this to her when I
10 was -- when I ran in to her at the lake. It
11 was during that conversation.

12 Q So it would be fair for me to say that
13 you didn't call her and tell her what he said
14 because he said it in jest and you didn't think
15 it was a serious statement?

16 A Right.

17 MR. TAREN: Excuse me, objection.

18 BY MS. DAVIS:

19 Q You didn't think it was a serious
20 statement; is that right?

21 A No.

22 Q No, you didn't think it was a serious
23 statement?

24 A I didn't think it was serious enough

Deposition of Michael Spaargaren - August 13, 2015

1 to like warrant anything. It was more said off
2 the cuff, so to speak.

3 Q If you had thought it was a serious
4 statement that somebody was going put a pipe
5 bomb under her car, would you have called
6 Shannon and told her?

7 A Oh, of course, yeah.

8 MS. DAVIS: Let's take a quick break.

9 (WHEREUPON, a break taken
10 from 11:34 a.m. to 11:45 a.m.)

11 MS. DAVIS: We're back on the record.

12 BY MS. DAVIS:

13 Q Officer Spaargaren --

14 A Spaargaren.

15 Q -- you're still under oath obviously?

16 A Okay.

17 Q All right, you mentioned before about
18 having seen a television report about this
19 case?

20 A Correct.

21 Q Did you see just one report?

22 A No. I think I saw two.

23 Q And do you remember when you saw the
24 first report?

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1 A I mean, probably like about -- I don't
2 want to speculate because I watch the news
3 pretty much all the time and I just happened to
4 see it on Channel 5.

5 Q And when you saw the first report, do
6 you recall anything in that report striking you
7 as surprising or different from any of the
8 conversations you had had with Shannon?

9 A No.

10 Q Do you remember what was said in the
11 report, the first report, you saw?

12 A No. Honestly I don't -- I remember
13 seeing it because I remember seeing her on the
14 news, but no, I don't remember the -- I mean, I
15 know it's online. I could pull it up and look
16 at it, but I don't remember it off the top of
17 my head.

18 Q What about the second report? You
19 recall seeing a second report?

20 A I do remember seeing a second report,
21 but I think it was for -- what is her name?
22 Janet Hannah, I think I saw her.

23 Q Do you remember anything that was said
24 in the second report?

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1 A Not right now, no.

2 Q And as you sit here now, do you
3 remember thinking that anything you saw in that
4 second report was different than any of the
5 other conversations you had with Shannon
6 Spaulding?

7 A No, no. I don't remember hearing
8 anything conflicting.

9 Q Do you remember talking to anyone
10 about the news report, either of the news
11 reports?

12 A Just my wife.

13 Q Anybody else?

14 A No, no; just my wife.

15 Q What is your wife's name?

16 A Diana.

17 Q Were you present at any point for any
18 of the alleged threats or cold shoulders or
19 anything of the things that Shannon said that
20 she was experiencing?

21 A No.

22 Q So do you have any firsthand knowledge
23 about any of the allegations that Shannon has
24 about what she's experienced?

Deposition of Michael Spaargaren - August 13, 2015

1 A No, just what she related to me.

2 Q So all the information you have is
3 based on what Shannon has told you; is that
4 right?

5 A Correct.

6 Q Besides Shannon, has anyone else told
7 you anything about anything Shannon has
8 experienced or is alleged to have experienced?

9 A No.

10 Q And what about Danny Echeverria? Is
11 it fair to say that you don't have any
12 firsthand knowledge about any of the
13 allegations that Danny Echeverria has in this
14 case?

15 A No.

16 Q And has anyone told you or said
17 anything to you about any of the allegations
18 that Danny has in this case?

19 A No, no. I am not familiar with his
20 stuff.

21 MS. DAVIS: That's all I have for you.
22 I don't have any further questions.

23 MR. TAREN: Okay, no questions.

24 MS. DAVIS: You reserve?

Deposition of Michael Spaargaren - August 13, 2015

1 MR. TAREN: Mike, you have the right
2 to read the deposition to make sure that
3 everything you said was taken down accurately.

4 THE WITNESS: Okay.

5 MR. TAREN: If you want to do that,
6 then it will probably be sent to me and I'd get
7 it to you to review. Do you want to do that.

8 THE WITNESS: Sure.

9 MR. TAREN: We'll reserve signature.

10 (Whereupon, at 11:50 a.m.,
11 the signature of the witness
12 having been reserved the
13 witness being present and
14 consenting thereto, the
15 taking of the instant
16 deposition ceased.)

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Deposition of Michael Spaargaren - August 13, 2015

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IN THE UNITED STATES DISTRICT COURT

3

NORTHERN DISTRICT OF ILLINOIS

4

EASTERN DIVISION

5

Chicago Police Officer)

6

SHANNON SPAULDING, Chicago)

7

Police Officer DANIEL)

8

ECHEVERRIA,)

9

Plaintiffs,) No. 12 CV 8777

10

vs.)

11

CITY OF CHICAGO, et al.,)

12

Defendants.)

13

14

I, MICHAEL THOMAS SPAARGAREN, state that

15

I have read the foregoing transcript of the

16

testimony given by me at my deposition on the

17

13th day of August, 2015, and that said

18

transcript constitutes a true and correct

19

record of the testimony given by me at the said

20

deposition except as I have so indicated on the

21

errata sheets provided herein.

22

23

MICHAEL THOMAS SPAARGAREN

24

Deposition of Michael Spaargaren - August 13, 2015

1 No corrections (Please initial)_____

2 Number of errata sheets submitted_____ (pgs.)

3

4 SUBSCRIBED AND SWORN TO

5 before me this ____ day

6 of _____, A.D. 2016.

7 _____

8 NOTARY PUBLIC

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Deposition of Michael Spaargaren - August 13, 2015

1 STATE OF ILLINOIS)

2) SS:

3 COUNTY OF C O O K)

4 I, KATHLEEN P. LIPINSKI, Certified Shorthand
5 Reporter No. 84-3808, Certified Shorthand
6 Reporter and Notary Public, in and for the
7 County of Cook, State of Illinois, do hereby
8 certify that previous to the commencement of
9 the examination, said witness was duly sworn by
10 me to testify the truth; that the testimony
11 given by said witness was reduced to writing by
12 means of shorthand and thereafter transcribed
13 into typewritten form; and that the foregoing
14 is a true, correct, and complete transcript of
15 my shorthand notes so taken as aforesaid.

16 I further certify that there were present at
17 the taking of the said deposition the persons
18 and parties as indicated on the appearance page
19 made a part of this deposition.

20 I further certify that I am not counsel for
21 nor in any way related to any of the parties to
22 this suit, nor am I in any way interested in
23 the outcome thereof.

24 I further certify that this certificate

Deposition of Michael Spaargaren - August 13, 2015

1 applies to the original and certified
2 transcripts only. I assume no responsibility
3 for the accuracy of any reproduced copies not
4 made under my control or direction.

5 IN TESTIMONY WHEREOF I have hereunto
6 set my hand and affixed my seal, this 18th day
7 of February, A.D., 2016.

8
9 
10

11 KATHLEEN P. LIPINSKI, CSR
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24

A	17:7	assignments (2)	56:20	37:12;39:12;45:19;
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